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ALASKA DEPARTMENT OF LABOR

DIVISION OF LABOR STANDARDS AND SAFETY

DOSH Program Directive 90-5

June 11, 1990

To: All OSH Compliance Personnel

From: Tom Stuart, Director *TS*

Subject: Local Emphasis Program for Oil Spill Cleanup Operations

- A. Purpose. This Program Directive sets the policy and procedures to be followed when making programmed (scheduled) safety or health local emphasis inspections of oil spill clean up operations.
- B. Policy. The Chief, Compliance shall use this Program Directive for inspection selection and scheduling for both safety and health. This inspection scheme is to be used for programmed safety and health inspections of the Exxon Valdez oil spill clean up operations. Only clean up operations and related activity in the State's jurisdiction will be affected. This includes cleanup crews' temporary living quarters on land, beach clean up operations and other activities associated with clean up operations that are not located on navigable waters. If there are any questions as to jurisdiction, the Chief shall consult with the Director before deciding whether or not to conduct an inspection.
- C. Procedures. The following procedures shall be complied with for scheduling and inspection of work sites under this Program Directive:
  - 1. Inspection Targeting and Scheduling.
    - a. Due to the mobility of the operations and the large geographic area involved, the Chief, Compliance shall prepare a listing of specific geographical areas that are known to be affected by clean up operations. Geographic areas will be beach areas at harbors, bays, inlets, islands, etc. where clean up operations are known to exist.
    - b. The Chief, prior to the start of any inspection activity, will contact the U.S. Coast Guard and the Anchorage Area Office of the Occupational Safety and Health Administration (OSHA) and other State or Federal agencies as appropriate, to identify site areas of operations to coordinate activities as necessary to conduct the inspection.

2. Inspection Scheduling:

a. From the office's program plan, the Chief, Compliance will estimate how many inspections will be conducted.

b. Based on local knowledge of clean up operations, the Chief, Compliance will select an operational area from the listing developed under paragraph C.1.a., and assign CO(s) and/or IH(s) to inspect all operations within the area. All operations will be inspected within one area before moving on to the next. Unprogrammed inspections, such as complaints and referrals, may be scheduled within any area at any time and will be identified and coded under this special emphasis program as describe in paragraph D. below.

D. Special Instructions.

1. AKDOSH-1 Coding: Inspections conducted under this program shall be coded on the Form AKDOSH-1, item 25c, with the designation "CLEANUP." Unprogrammed inspections shall also be classified and coded under this local emphasis program.

2. Evaluation Procedures: Upon completion of the oil spill clean up operations in September, an evaluation of the special emphasis program will be prepared.

a. The Chief, Compliance shall evaluate the program and submit the following information to the Commissioner through the Director no later than September 30, 1990:

(1) Basic statistical information consisting of number of inspections conducted, number and types of violations issued, number of "no inspections", number of contests and number of denials of entries.

(2) Any special problems which may have surface and recommended solutions.

(3) Any alternative procedure or other thoughts or ideas regarding the program and recommendations for its renewal or non-renewal.